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*Attorneys for plaintiff Alfred H. Siegel, solely  
in his capacity as Trustee of the Circuit City  
Stores, Inc. Liquidating Trust*

[additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Master File No. 3:07-CV-5944-SC

MDL No. 1917

This Document Relates to:

*Best Buy Co., Inc., et al. v. Technicolor SA, et al.,  
No. 13-cv-05264;*

*Costco Wholesale Corporation v. Technicolor SA, et  
al., No. 13-cv-005723;*

*Crago, d/b/a Dash Computers, Inc. et al., v.  
Mitsubishi Electric Corporation, et al., No. 14-cv-  
02058;*

*Electrograph Systems, Inc., et. al. v. Technicolor SA,  
et al., No. 13-cv-05724;*

*Interbond Coporation of America v. Technicolor SA,  
et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al., No. 13-  
cv-05726;*

*P.C. Richard & Son Long Island Corporation, et al.  
v. Technicolor SA, et al., No. 13-cv-05725;*

*Schultze Agency Services, LLC v. Technicolor SA, et  
al., No. 13-cv-05668;*

**DECLARATION OF ROBERT S.  
SAFI IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF  
THEIR OPPOSITION TO  
TECHNOLOGIES DISPLAYS  
AMERICAS LLC'S MOTION FOR  
SUMMARY JUDGMENT  
PURSUANT TO CIVIL LOCAL  
RULES 7-11 AND 79-5(d)**

*Sears, Roebuck and Co., et al. v. Technicolor SA, et al.*, No. 13-cv-05262;

*Sharp Elecs. Corp. v. Hitachi, Ltd.*, No. 13-cv-01173;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

*Target Corp., v. Technicolor SA, et al.*, No. 13-cv-05686.

I, Robert S. Safi hereby declare as follows:

1. I am attorney and counsel for the plaintiff Alfred H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust in this MDL proceeding.

2. I submit this declaration in support of Plaintiffs' Administrative Motion to Seal Portions of their Opposition to Technologies Displays Americas LLC's Motion for Summary Judgment pursuant to Civil Local Rules 7-11 and 79-5(d).

3. Portions of Plaintiffs' Opposition contain excerpts from and/or statements derived from documents and testimony which have been designated "confidential" or "highly confidential" pursuant to the Stipulated Protective Order governing this litigation [Dkt. 306, June 18, 2008], ("Stipulated Protective Order"). The confidential/highly confidential designations were made by certain defendants in this litigation. To qualify as confidential or highly confidential under the Stipulated Protective Order, information must contain trade secrets or other confidential research, development, or commercial information or private or commercially sensitive information. Stipulated Protective Order at ¶ 1.

4. The Stipulated Protective Order requires that a party may not file any confidential material in the public record. Stipulated Protective Order at ¶ 10. The Stipulated Protective Order further provides that any party seeking to file any confidential material under seal must comply with Civil Local Rule 79-5. Stipulated Protective Order at ¶¶ 1, 10.

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2           5.       The highlighted portions of Plaintiff's Opposition contain such material. The  
3 following exhibits also contain material that certain defendants have designated as confidential or  
4 highly confidential and, pursuant to Local Rule 79-5(e), Plaintiffs seek to submit this material  
5 under seal in good faith in order to comply with the Stipulated Protective Order and the applicable  
6 Local Rules: Exhibit 3, Exhibit 4, Exhibit 7, Exhibit 8, Exhibit 9, Exhibit 11, Exhibit 12, Exhibit  
7 13, Exhibit 14, Exhibit 15, Exhibit 16, Exhibit 17, Exhibit 18, Exhibit 19, Exhibit 20, Exhibit 21,  
8 Exhibit 22, Exhibit 23, Exhibit 24, Exhibit 25, Exhibit 26, Exhibit 27, Exhibit 28, Exhibit 29,  
9 Exhibit 30, Exhibit 31, Exhibit 32, Exhibit 33, Exhibit 34, Exhibit 36, and Exhibit 37.  
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11           6.       Therefore, Plaintiffs respectfully request an order sealing portions of Plaintiffs'  
12 Opposition and the exhibits identified above.  
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14           I declare under penalty of perjury that the foregoing is true and correct.

15           Executed on this 23rd day of December, 2014 at Houston, Texas.  
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